

**CLEARY GOTTlieb STEEN  
& HAMILTON LLP**

Jennifer Kennedy Park (SBN 344888)  
jkpark@cgsh.com

1841 Page Mill Rd Suite 250  
Palo Alto, CA 94304  
Tel: +1 (650) 815-4100

Roger A. Cooper (Admitted pro hac vice)  
Samuel Levander (Admitted pro hac vice)  
Victoriya Levina (Admitted pro hac vice)  
Andrew G. Khanarian (Admitted pro hac vice)

One Liberty Plaza  
New York, NY 10006

Attorneys for Defendant  
POLYCHAIN ALCHEMY, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Amanda Houghton; Charles Douglas; and  
Susan Franklin,

Plaintiffs,

v.

Compound DAO; Robert Leshner; Geoffrey  
Hayes; AH Capital Management, LLC;  
Polychain Alchemy, LLC; Bain Capital  
Ventures (GP), LLC; Gauntlet Networks, Inc.;  
Paradigm Operations LP,

Defendants.

Case No. 3:22-cv-07781-WHO

**DECLARATION OF SAMUEL  
LEVANDER IN SUPPORT OF JOINT  
STIPULATION AND [PROPOSED]  
ORDER SETTING DEADLINES RE: THE  
SECOND AMENDED COMPLAINT**

1 I, Samuel Levander, declare pursuant to 28 U.S.C. § 1746 as follows:

2 1. I am an attorney at law, duly licensed and authorized to practice law in the State of New  
3 York. On February 2, 2023, this Court approved my application to appear before this Court *pro*  
4 *hac vice*.

5 2. I am a partner of Cleary Gottlieb Steen & Hamilton LLP, counsel to Polychain Alchemy  
6 LLC (“Polychain Alchemy”) in this action. I am fully familiar with the facts and circumstances  
7 set forth herein.

8 3. I make this declaration pursuant to Local Rule 6-2(a) and in support of the accompanying  
9 Joint Stipulation and [Proposed] Order Setting Deadlines re: the Second Amended Complaint.<sup>1</sup>

10 4. On November 4, 2024, Plaintiffs filed a Motion for Leave to Amend the First Amended  
11 Complaint.

12 5. On January 28, 2025, proceedings were stayed pending resolution of Defendants’ appeal  
13 to the Ninth Circuit of the Court’s order denying Defendants’ motion to compel arbitration (ECF  
14 No. 242), and the Motion to Amend was administratively terminated, with the Clerk’s Notice  
15 stating that “[t]he motions may be re-noticed when the stay is lifted” (ECF No. 243).

16 6. Plaintiffs sent to Defendants a proposed Second Amended Complaint on December 12,  
17 2025.

18 7. The Parties have met and conferred and jointly agreed to a schedule for briefing on any  
19 motion to dismiss the proposed Second Amended Complaint. Plaintiffs and Defendants stipulate  
20 and agree to the following deadlines regarding the Motion to Amend:

- 21 • Plaintiffs shall file the Second Amended Complaint within one business day of the
- 22 Court’s order entering this stipulation;
- 23 • The filing of the Second Amended Complaint shall be without prejudice to any of
- 24 Defendants’ or Proposed Defendants’ rights, claims, or defenses, and shall in no way
- 25 impair or waive any of Defendants’ or Proposed Defendants’ rights to raise (in a Motion
- 26 to Dismiss or otherwise) any defense in response to Plaintiffs’ claims that could have been

27 <sup>1</sup> Each capitalized term used but not defined here has the meaning ascribed to it in the Joint  
28 Stipulation and [Proposed] Order Setting Deadlines re: the Second Amended Complaint.

1 raised in an opposition to a motion to amend, including, but not limited to, any argument  
 2 or defense that the Proposed Defendants cannot properly be added as defendants to this  
 3 action;

- 4 • Defendants and/or Proposed Defendants shall file any Motions to Dismiss within 14 days  
 5 of the filing of the Second Amended Complaint;
- 6 • Plaintiffs shall file any oppositions to the Motions to Dismiss by 21 days after the filing of  
 7 any Motions to Dismiss;
- 8 • Defendants and Proposed Defendants shall file any replies in support of the Motions to  
 9 Dismiss by 14 days after the filing of such oppositions;
- 10 • Any Defendant or Proposed Defendant need not answer the Second Amended Complaint  
 11 until after the Court adjudicates all Motions to Dismiss, and the Parties agree to meet and  
 12 confer within five business days of the Court's ruling on the Motions to Dismiss to set a  
 13 deadline for Defendants to answer the Second Amended Complaint; and
- 14 • Plaintiffs agree that they will not conduct discovery with respect to the Proposed  
 15 Defendants prior to the deadline to file any Motion to Dismiss, and further agree not to  
 16 conduct discovery with respect to the Proposed Defendants during the pendency of any  
 17 Motion to Dismiss filed by the Proposed Defendants.

18 8. There have been three previous extensions with respect to the Motion to Amend. *See* ECF  
 19 Nos. 212, 216, 240. There have been several other previous time modifications in this litigation,  
 20 whether by stipulation or by Court order (ECF Nos. 30, 75, 86, 96, 139, 172, 189, 230).

21 9. The requested time modification would not have a material impact on the overall schedule  
 22 of the case.

23 I declare that the foregoing is true and correct to the best of my knowledge.

24 Executed in New York, NY on January 14, 2026.

25  
 26  
 27 

28 Samuel Levander